



# DAVENIES

## Privacy Notice – Old Davenians & Other Supporters

### General Statement

Under Data Protection law, individuals have a right to be informed about how the School uses any personal data that we hold about them. The School complies with this right by providing ‘privacy notices’ (sometimes called ‘fair processing notices’) to individuals where we are processing their personal data.

This Privacy Notice explains how the School collects, stores and uses personal data about **former pupils or alumni of the School “Old Davenians”, and other supporters of the School**, regardless of whether it is in paper or electronic format. All personal data is handled in line with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. This Privacy Notice applies to the whole School, and is in addition to the School’s other relevant terms and conditions and policies.

### Data Controller

We, Beaconsfield Educational Trust Ltd operating as Davenies School (“the School”), are the ‘Data Controller’ for the purposes of data protection law.

### The Personal Data We Hold

Personal data that we may collect, use, store and share (when appropriate) about **former pupils and other supporters** includes, but is not restricted to:

- Personal identifiers and contacts such as your name, address, unique pupil number, contact details, date of birth.
- Details about your time at the school, including records of your achievements and interests.
- Photographs of your time at the School, at more recent events, including CCTV images for security purposes.
- Details of your experience, career and employers since you left the School.
- Records of contributions you have made to the School since leaving, such as your time, expertise or money.
- Records of how you have engaged with our alumni network, including email communications, events attended, mailing lists you have signed up to and any other interactions.
- Information required to manage your attendance at alumni events, including access arrangements and dietary requirements (which could amount to ‘special category’ personal data, which is more sensitive).

- Bank details and other financial information, if you make any payments to the School.
- Records associated with Gift Aid claims on donations.

## Why We Use This Data

We use this data to:

- help us build a community around the School;
- offer enrichment and career development opportunities to current pupils;
- raise extra money so that we can continue to improve the experience pupils get from the School;
- notify Old Davenians and supporters of alumni events they may be interested in;
- keep you up to date with School news;
- help us promote the School;
- keep you safe and comfortable while attending alumni events;
- tailor the communications we send to you, to ensure they are appropriate and relevant;
- support 'Track & Trace' services in the event of a national or local pandemic;

and for other reasonable purposes relating to the operation of the School.

## Use of your personal information for marketing purposes

Where you have given us consent to do so, the School may send you marketing information by email or text promoting school events, campaigns, charitable causes or services that may be of interest to you. You can withdraw consent or 'opt out' of receiving these communications at any time by contacting the School Office or our Data Protection Officer.

## Our Legal Basis for Using This Data

We only collect and use your personal data when the law allows us to. Most commonly, we process it where we have obtained explicit consent to use it in a certain way, and where we have legitimate interests in processing the data.

We process personal data in order to fulfil our **contractual obligations** to provide educational services, safeguard and promote the welfare of all pupils, promote the objects and interests of the School, facilitate the efficient operation of the School and ensure that all relevant legal obligations of the School are complied with.

Other uses of personal data will be made in accordance with the School's **legitimate interests**, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals and provided it does not involve special categories or sensitive types of data. Where it is required we will seek your informed **consent** to process personal data. Where we have obtained consent, this consent can be withdrawn at any time. We will make this clear when we ask for consent, and explain how to withdraw it. Where we have legitimate interests in processing your data, we will carry out a 'balancing test' to make sure our processing does not infringe your interests, rights and freedoms.

We will only use the data in ways that you would reasonably expect.

The legitimate interests we have are:

- asking you for financial contributions towards the School, and facilitating this efficiently;
- analysing the composition of our alumni group to help us decide what events or activities to run;
- providing you with marketing communications based on what we think you will be interested in.

In addition, we may process your personal data in order to comply with our legal obligations, such as our accounting and reporting requirements in relation to any donations received, and complying with our duties under equality legislation.

Less commonly, we may process alumni personal data in situations where:

- We need it to perform an official task in the public interest.
- We need to protect someone's vital interests (save your life, or someone else's).

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds, which justify our use of your data.

### **Collecting This Data**

We will only collect personal data for specified, explicit and legitimate reasons. If we want to use personal data for reasons other than those given when we first obtained it, we will inform the individuals concerned and obtain consent before we do so.

### **How We Store This Data**

We will keep your personal data while you remain involved in our alumni and /or supporters network. We keep personal data electronically on the School's information management systems, the School's network or manually in indexed filing systems. We may also keep it beyond your involvement with the alumni and /or supporters network if this is necessary in order to comply with our legal obligations and legitimate interests. Our *Data Protection Policy – Good Practice Guide* sets out how long we keep information about former pupils and other supporters. A copy is available on request from the Bursar.

The School will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to School systems. All staff and governors will be made aware of this Notice and their duties under Data Protection Law and receive relevant training. We will dispose of your personal data securely when we no longer need it.

### **Data Sharing**

For the most part, personal data collected by the School will remain within the School and will be processed by appropriate members of staff only in accordance with the School's Data Protection Policy.

We will not normally share personal data of former pupils and other supporters with anyone else, but may do so when the law and our policies allow us to do so. Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about alumni when:

- There is an issue with a pupil or parent/carer that puts the safety of a pupil or our staff at risk
- We need to undertake financial transactions

- We need to liaise with other agencies:
  - to compile statistical information (normally provided on an anonymous basis)
  - to safeguard pupils' welfare and provide appropriate pastoral (and where relevant, medical and dental) care for pupils
  - where specifically requested by third parties

We will also share personal data with law enforcement and government bodies where we are legally required to do so, including for:

- The prevention or detection of crime and/or fraud
- The apprehension or prosecution of offenders
- In connection with legal proceedings
- Where the disclosure is required to satisfy our safeguarding obligations
- Research and statistical purposes, as long as personal data is sufficiently anonymised, or consent has been provided

We may also share personal data with emergency services and local authorities to help them to respond to an emergency situation that affects any of our alumni or other supporters.

We will only transfer personal data to a country or territory outside the European Economic Area if we are satisfied the third party(s) involved will only process the data in accordance with data protection law.

### **Old Davenians and Supporters' Rights Regarding Personal Data**

Individuals have a right to make a 'Subject Access Request' to gain access to personal information that the School holds about them. This includes:

- Confirmation that their personal data is being processed
- Access to a copy of the data
- The purposes of the data processing
- The categories of personal data concerned
- Who the data has been, or will be, shared with
- How long the data will be stored for, or if this isn't possible, the criteria used to determine this period
- The source of the data, if not the individual
- Whether any automated decision-making is being applied to their data, and what the significance and consequences of this might be for the individual

If you would like to make a request, please contact the Bursar.

### **Other Rights**

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe, including the right to:

- To request rectification of any data that is inaccurate or incomplete
- To have their personal data erased and to prevent further processing if:
  - It is no longer required for the purposes for which it was collected

- Consent is withdrawn
  - There is an opposition to the processing and no superseding legitimate interest
  - The personal data is being unlawfully processed
  - The personal data must be removed in order to comply with a legal obligation
- Request a restriction of further processing of personal data
  - Object to processing on specific grounds

To exercise any of these rights, please contact the Bursar.

## Complaints

We take any complaints about our collection and use of personal information very seriously. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance. To make a complaint, please contact the Bursar.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

## Contact Us

For further information, see our *Data Protection Policy*. If you have any questions, please contact the Bursar: [bursar@davenies.co.uk](mailto:bursar@davenies.co.uk)

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